

**CONTAINS HIGHLY CONFIDENTIAL INFORMATION  
SUBJECT TO PROTECTIVE ORDER**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

1) VIDEO GAMING TECHNOLOGIES, INC.,	)	
	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 4:17-cv-00454-GKF-jfj
	)	
1) CASTLE HILL STUDIOS LLC	)	
(d/b/a CASTLE HILL GAMING);	)	
2) CASTLE HILL HOLDING LLC	)	
(d/b/a CASTLE HILL GAMING); and	)	
3) IRONWORKS DEVELOPMENT, LLC	)	
(d/b/a CASTLE HILL GAMING)	)	
	)	
Defendants.	)	

**DECLARATION OF MICHAEL SAWYER IN SUPPORT OF PLAINTIFF  
VIDEO GAMING TECHNOLOGIES, INC.'S MOTION IN LIMINE  
REGARDING CASTLE HILL GAMING DEFENSES AND BRIEF IN SUPPORT**

1. I am an attorney with the law firm of Covington & Burling LLP, counsel for Plaintiff Video Gaming Technologies, Inc. ("VGT").

2. Attached as **Exhibit A** is a true and correct copy of Interrogatory No. 14 in VGT's Second Set of Interrogatories to CHG, dated January 18, 2018.

3. Attached as **Exhibit B** is a true and correct copy of the Response to Interrogatory No. 14 in CHG's Objections and Answers to Plaintiff's Second Set of Interrogatories, dated February 20, 2018.

4. Attached as **Exhibit C** is a true and correct copy of an email sent from Mr. Gill to Gary Rubman, dated August 2, 2018.

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5. I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 12, 2018 in Washington, District of Columbia.

/s/ Michael Sawyer  
Michael Sawyer

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**CERTIFICATE OF SERVICE**

I hereby certify that on October 12, 2018, I filed the foregoing Declaration of Michael Sawyer via ECF, which caused a true and correct copy of the foregoing to be delivered to the following counsel for Defendants:

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/s/ Gary M. Rubman